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27 Attorneys for Defendants, VICTORIA E. BRIEANT and
28 LAW OFFICE OF VICTORIA E. BRIEANT

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

ABN CORPORATION, a Wyoming
corporation, RS MEDICAL SUPPLY, LLC,
a Nevada Limited Liability company,

Plaintiffs,

v.

GROUPE PELM INTERNATIONAL
CORPORATION, a foreign corporation,
CHRISTIAN PELLEGRINI, an individual,
LAW OFFICE OF VICTORIA E.
BRIEANT, P.A., a Florida corporation,
VICTORIA E. BRIEANT, an individual,

Defendants.

Case No. 3:23-cv-00004-RFL (LJC)

**JOINT STIPULATION REGARDING
DISCOVERY**

DATE: 7/18/25

LOCATION: San Francisco Courthouse,
Courtroom 15, 18th Floor
450 Golden Gate Avenue, San Francisco,
CA 94102

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3 Plaintiffs, ABN CORPORATION and RS MEDICAL SUPPLY, LLC, and Defendants,
4 VICTORIA E. BRIEANT and LAW OFFICES OF VICTORIA E. BRIEANT, P.A. (“the
5 Brieant Defendants”), through their respective counsel of record, hereby submit their joint
6 stipulation regarding their November 4, 2024 discovery letter (ECF No. 95), and agree and
7 stipulate as follows:

8 1. On July 17, 2025, the Brieant Defendants served their verifications for their
9 supplemental discovery responses to Plaintiffs Second Set of Request for Production of
10 Documents and Things, and Second Set of Special Interrogatories.

11 2. On August 18, 2025, the Plaintiffs will file and serve a Motion to Compel
12 Further Responses to their Second Set of Request for Production of Documents and Things and
13 Second Set of Special Interrogatories Against the Brieant Defendants.

14 3. On August 29, 2025, the Brieant Defendants will file and serve their Opposition
15 to the aforesaid Motion.

16 4. On September 5, 2025, the Plaintiffs will file and serve their Reply to the
17 Brieant Defendants Opposition.

18 5. The Court will schedule the hearing on the Motion for September 16, 2025 at
19 10:30 a.m. in the San Francisco Courthouse, Courtroom G – 15th Floor, 450 Golden Gate
20 Ave., San Francisco, CA 94102.

21 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

22
23 Dated: 7/18/25

WILLIAMS LAW FIRM

24
25 By: 

26 Jimmie L. Williams, Jr.
27 Attorneys for Plaintiffs,
28 ABN CORPORATION and RS MEDICAL
SUPPLY, LLC

Dated: 7/18/25

LEWIS BRISBOIS BISGAARD & SMITH

By: 

Alex A. Graft

Kristin Choi

Attorneys for Defendants,

VICTORIA E. BRIEANT And LAW OFFICE

OF VICTORIA E. BRIEANT, P.A.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: July 18, 2025


LISA J. CISNEROS

UNITED STATES MAGISTRATE JUDGE